

RESPONSE TO PUBLIC COMMENTS ON THE
DRAFT REMEDIAL ACTION PLAN (RAP)
FOR THE FORMER CHASE CHEMICAL/HOLCHEM SITE, PACOIMA

I. INTRODUCTION AND BACKGROUND

The Former Chase Chemical/Holchem site is located at 13540 and 13546 Desmond Street in Pacoima, California. The approximately two-acre site is a former chemical distribution facility where chemicals, including chlorinated volatile organic compounds (VOCs), were handled until 2001. In 2000, a Consent Decree was issued by the U.S. District Court for the investigation and cleanup of the site. The Department of Toxic Substances Control (DTSC) is the lead agency overseeing the investigation and cleanup.

A Remedial Investigation (RI) of the site was conducted from 2001 to 2003. During the RI, soil, soil gas, and groundwater samples were collected from several locations on-site. Additional groundwater samples were collected off-site. The RI has been approved by DTSC. Based on the data collected, a Health Risk Assessment was prepared. The Health Risk Assessment found that the pre-cleanup levels of chemicals of concern at the site pose an unacceptable risk to human health and the environment for full-time workers on the site. The chemicals of concern that contribute to an increased health risk at the site are VOCs, including perchloroethylene (PCE) and tetrachloroethylene (TCE). The results of the soil vapor testing in the residential area downgradient of the site indicate the levels of contaminants in soil vapor originating from the Former Chase Chemical/Holchem site are within acceptable risk levels for residential use consistent with DTSC guidelines (1×10^{-6} risk, or one person in a million).

In 2004, a Feasibility Study (FS) was conducted to evaluate cleanup alternatives for the site using U.S. EPA and DTSC guidelines, and approved by DTSC. Based on the FS, a Remedial Action Plan (RAP) was prepared in accordance with the California Health and Safety Code section 25356.1. The RAP presents the cleanup alternative for the site that best meets the criteria required by U.S. EPA and DTSC. A new or amended Consent Decree will need to be approved by the United States District Court before the RAP for the site is implemented.

The cleanup plan described in the RAP includes the following components:

1. Continuation of the soil vapor extraction (SVE) system already in operation at the site since 2003 to cleanup contaminated soil;
2. Extraction wells on the site and at downgradient locations to pump and treat contaminated groundwater;
3. Monitoring natural attenuation (natural breakdown of the remaining contaminants) for groundwater downgradient from the site to ensure the concentrations meet acceptable levels to DTSC, presently stated to be drinking water standards;
4. Deed restriction for the site to prevent residential use or other sensitive uses and require commercial/industrial use only.

The draft RAP for the Former Chase Chemical/Holchem site was under public review from April 20, 2005 to July 20, 2005. Documents have been made available at public repositories, including the Pacoima Library and the DTSC office in Glendale. A public meeting was held on May 4, 2005 to present the draft RAP and receive and respond to comments and concerns. Several comments on the RAP were received during the public comment period and are presented below. Comments are grouped by individual commenter with DTSC responses following.

II. RESPONSE TO COMMENTS

Comments from Neighborhood Legal Services

Comment 1a

We are concerned about the current extent and adequacy of site characterization, particularly with respect to groundwater, especially given recent data provided by the California Regional Water Quality Control Board (Water Board) documenting deep groundwater contamination.

DTSC Response 1a

The Department of Toxic Substances Control (DTSC) has reviewed and evaluated the new data from the report “Results of Grab Groundwater Sampling, Phase 2- Saturated Zone Investigation”, by Erler & Kalinowski, Inc. (EKI), consultants to Black and Decker, containing the test results from deep depth-discrete groundwater grab samples. The report presents findings that are generally consistent with the nature and extent of the contamination at the Former Chase Chemical/Holchem site, as presented in the Remedial Investigation/Feasibility Study (RI/FS). A copy of a response letter prepared by ARCADIS, dated November 15, 2005, assessing the EKI results is on file in the repository for this site for public review.

When developing the Remedial Design for implementation of the Remedial Action Plan (RAP) for the Former Chase Chemical/Holchem, DTSC will require additional deep (>250 feet, if necessary) soil boreholes for collecting grab groundwater samples west of San Fernando Road. The purpose of these deep borings is to 1) determine the downgradient extent of the groundwater contamination for compliance with the groundwater monitoring component of the RAP, and 2) validate the groundwater modeling conducted in the RI/FS. DTSC has consulted with the Los Angeles Regional Water Quality Control Board (LARWQCB) regarding the proposed additional deep boring locations.

Comment 1b

We are concerned about the potential for dioxin and other toxic air contaminants from the proposed soil vapor extraction treatment system.

DTSC Response 1b

Current scientific data shows that dioxins would not likely be formed by Soil Vapor Extraction (SVE) units in measurable quantities. DTSC engineers are further evaluating this issue of the level of dioxin emissions from SVE systems in general, such as the one currently in operation at the Former Chase Chemical/Holchem site, but are not presently aware of any data to suggest that continued use of the SVE system on-site at the Former Chase Chemical/Holchem site, or the subsequent implementation of the proposed groundwater pump and treat system in the RAP, will create any health and safety concerns from dioxin emissions.

While the preliminary data show that dioxins are formed at higher than expected levels, the data are very limited, and an examination of the data suggests that the average level of emission is not that dissimilar to burning clean wood in a fireplace or wood stove (0.1664 nanogram international toxic equivalents/cubic meter, or 0.1664 ng TEQ/m³). The U.S. EPA hazardous Waste Combustion standard is 0.2 ng TEQ/m³.

The manufacturer of the system installed at the Former Chase Chemical/Holchem site, King, Buck Technology, has tested one of their SVE systems by collecting air samples upstream and downstream of the catalytic system effluent stack. The laboratory results indicated lower dioxin concentration in the downstream sample when compared to the upstream (ambient) sample concentrations. The upstream sample was reported to contain 0.015 ng TEQ/m³ and the downstream sample was reported at 0.0074 ng TEQ/m³. This implies the dioxin concentration in the airstream leaving the stack of the catalytic oxidizer was lower than the ambient air concentration.

At this site, DTSC has determined that the current system is the preferred alternative since concentrations of VOCs are too high for alternative technologies such as granulated activated carbon (GAC), and since, again, any dioxin emissions are expected to be minimal. However, when VOC concentrations decrease, the current SVE system will be converted to a vapor-phase GAC treatment system which should then eliminate any concern with dioxin emissions.

Comment 1c

We request further clarification in the RAP that the Water Board has designated the particular aquifer beneath the former Chase Chemical site as a drinking water source.

DTSC Response 1c

The RAP has been revised to state:

“In the San Fernando Valley, most groundwater is classified for beneficial use, including use as a municipal drinking water source. However, groundwater beneath the site in the local area is not currently used for drinking water”.

Comment 1d

Given the proximity of residential properties to the site, we urge that the site be cleaned up to residential use standards.

DTSC Response 1d

The property is zoned for commercial/industrial use only, and a deed restriction will be put in place to ensure this use in the future. The results of the soil vapor testing in the residential area indicate the levels of contaminants in soil vapor originating from the Former Chase Chemical/Holchem site are within acceptable risk levels for residential use consistent with DTSC guidelines (1×10^{-6} risk, or one person in a million). Any potential contamination originating from the Former Chase Chemical/Holchem site that impacted nearby residential sites will be cleaned up to residential standards.

Comment 1e

The results of the second round of confirmatory soil vapor intrusion testing in early July, 2005, must be analyzed and addressed in the final RAP.

DTSC Response 1e

The RAP has been revised to incorporate the results of the soil vapor testing.

Comment 1f

Remediation of the plume under Sutter Street should be included as a Remedial Action Objective.

DTSC Response 1f

The RAP outlines the groundwater cleanup measures, which include 1) removing contaminants using extraction wells on-site and on Paxton Street and 2) addressing the downgradient portion of the plume, which is currently known to be under Sutter Street, through a combination of removing contaminants and by monitored natural attenuation (natural breakdown of the remaining contaminants). The results of testing of the new deep borings west of San Fernando Road will be used during the Remedial Design and Remedial Action Implementation to determine the downgradient extent of the

groundwater contamination for compliance with the groundwater monitoring component of the RAP.

Comment 1g

We ask the DTSC to include in the RAP future post-remediation safeguards to monitor for potential migration of contaminants from the site to nearby residential properties.

DTSC Response 1g

The RAP has been revised to state that groundwater monitoring will be an integral part of the cleanup of the site. Groundwater is currently being monitored along Sutter Street. Additional monitoring will be conducted in new locations at the downgradient edge of the plume. The purpose of this monitoring is to verify that the groundwater cleanup levels reach the Remedy's groundwater cleanup goal, presently stated to be Maximum Contaminant Levels, MCLs, which are developed by the California Department of Health Services for drinking water.

Comment 1h

We urge DTSC to continue to coordinate the efforts between the clean up at Price Pfister and the clean up at the former Chase Chemical site.

DTSC Response 1h

DTSC and the LARWQCB continue to coordinate on the ongoing assessment and cleanup activities at the Former Chase Chemical/Holchem and Former Price Pfister sites.

Comments from California Assemblymember

Comment 2a

Is there a possibility that denser chemicals in the deeper aquifer could be missed by the bore holes drilled to date? It is possible that these chemicals, if there, are contributing to the commingled plume?

DTSC Response 2a

The findings from both the Former Chase Chemical/Holchem and Price Pfister investigations, including the recent EKI report, support the conclusions that 1) DNAPL (dense non-aqueous phase liquid) does not exist in the deep aquifer, 2) VOC concentrations are low in the deep aquifer, and 3) the types of contaminants recently detected are consistent with previous findings. Therefore, the possibility that significant contamination in the deep aquifer was missed during previous investigations is highly

unlikely. The new deep borings will provide additional information regarding the possible contribution of contaminants in the vertical (deep) extent of the downgradient plume. Also, please see DTSC Response 1a.

Comment 2b

Does the use of the current incinerator guarantee lowest possible exposure to people and animals? How and when has the air in the immediate area been monitored? Is it effective in removing all hazardous gases, including dioxins? Does its eventual replacement with phase carbon adsorption devices imply that a more effective technology will not be used until is “cost effective”? What costs are measured here by whom?

DTSC Response 2b

Please see DTSC Response 1b. In addition, the South Coast Air Quality Management District (SCAQMD) has issued a permit for the current operation of the soil vapor treatment system. The SCAQMD conducts periodic inspections and requires regular testing of the system to ensure the emissions from the system are within acceptable levels. In addition, analytical testing of the emissions is also performed on a regular basis.

As stated in DTSC Response 1b, the type of system was determined based on the best technology available for the high concentrations at the site, not just because of cost.

Comment 2c

How will water quality be monitored as cleanup approaches completion? What offsite migration downgradient from the site can be effectively remediated? Does DTSC contemplate treating groundwater after source chemicals at Desmond are removed from soil? Is it possible to install equipment offsite should the need arise or will all groundwater treatment be limited to the Desmond property?

DTSC Response 2c

Please see DTSC Responses 1f and 1g.

Comment 2d

Does the finding of benzene offsite have any implications for tests already conducted at Desmond? If not, how does the community in the residential area most proximate to Louvre, Sutter and San Fernando Road get the necessary testing and protection (remediation?) if both firms involved in Paxton and Desmond are not responsible? Does DTSC have to find the responsible party and require it to pay the costs before any tests are done to protect the public?

DTSC Response 2d

As stated in DTSC Response 1d, the results of the soil vapor testing indicate the levels of contaminants in soil vapor originating from the Former Chase Chemical/Holchem site are within acceptable risk levels used by DTSC (1×10^{-6} risk, or one person in a million). In addition, during the second round of soil vapor testing, benzene was not detected. DTSC will continue to investigate other potential sources of contamination.

Comment 2e

How much lower is the industrial use standard when compared to residential? Is it possible to find a more comprehensive deed restriction that can be used in this case to avoid loopholes that might endanger future employees of the site?

DTSC Response 2e

DTSC considers a conservative standard of 1×10^{-6} risk (one person in a million) an acceptable risk for residential or other sensitive uses, and 1×10^{-5} risk (one person in one hundred thousand) acceptable for commercial/industrial use. For residential sites, it is assumed that people will spend much more time on-site, therefore the level of contamination must be lower than at commercial/industrial sites, where people spend much less time. The deed restriction will prevent the Former Chase Chemical/Holchem site from being occupied for residential or other sensitive uses, thereby limiting the amount of potential exposure for all future users of the site.

Comment 2f

Has the RWQCB provided DTSC with any data that assists you in the characterization of the site. Does DTSC have data needed by RWQCB in its assessment of the Price Pfister cleanup? Has the RWQCB offered to assist DTSC on groundwater plumes at Desmond Street? What cleanup technologies are currently shared? Are there any MOUs between agencies re: both sites? Are these in the document repository?

DTSC Response 2f

DTSC is coordinating with the LARWQCB regarding the assessment and cleanup of the Former Chase Chemical/Holchem and Price Pfister sites. DTSC has reviewed all data relevant to the Former Chase Chemical/Holchem site. Some aspects of cleanup of the sites are similar and will use the same technologies. There is currently no specific Memorandum of Understanding (MOU) between the two agencies with regard to these two sites. However, there is on-going communication and cooperation.

Comment 2g

Are these methods four methods (a. concrete cap over the soil, b. stabilization, c. soil flushing, and d. biological treatment) listed as part of a normative DTSC list of methods or are they specific to Desmond Street? Do these alternatives represent efforts to meet the established cleanup goals or do they represent an attempt to satisfy a reduced standard for cleanup? How can b, c, and d be carried out at the site? Does it entail massive soil removal?

DTSC Response 2g

As summarized in the RAP, several cleanup alternatives were evaluated using the U.S. EPA's Nine Criteria according to the National Contingency Plan (NCP). The details of the evaluation of alternatives are included in the Feasibility Study, which is available in the public repositories. Based on this evaluation, the preferred cleanup alternative outlined in the RAP was selected because it best met the remedial objectives for the site. The SVE system is being used to treat the soil contamination; no soil removal is planned.

Comment 2h

Has the extension of public review stalled any monitoring or testing of water, gas or soil? Does the pushing back of remediation plans preclude timely action for a moving plume? What can our office do in the community and in Sacramento to help DTSC keep pace with changes in the next few months?

DTSC Response 2h

Extending the public review period has not stalled monitoring or testing of water, gas, or soil. However, it has prolonged development of the Remedial Design for the site. DTSC appreciates the community's thorough review and consideration of the proposed remediation plan and has revised the RAP in consideration of the public comments.

Comments from Los Angeles Unified School District

Comment 3a

Based on the available groundwater data, the plumes from both sites are flowing to the SSE. However on the south side of the Verdugo fault that is running along San Fernando Boulevard the groundwater gradient is to SW towards Telfair School. The extent of the plume on the south side has not been fully characterized. The District recommends that the plume be fully delineated and an assessment be made to ensure that Telfair Avenue School is not impacted from contaminants in groundwater.

DTSC Response 3a

Based on DTSC review of all available data, the Telfair School is cross-gradient (perpendicular to), not downgradient, of the plume. In addition, as stated in DTSC Response 1d, the results of the soil vapor testing upgradient of the Telfair School indicate the levels of contaminants in soil vapor originating from the Former Chase Chemical/Holchem site are within acceptable risk levels used by DTSC (1×10^{-6} risk, or one person in a million).

Comment 3b

If soil vapor extraction and air sparging is to be performed with thermal destruction of the vapors, the treatment system should be designed so that potential thermal breakdown compounds such as dioxins and furans are not emitted that could pose a risk to the surrounding community.

DTSC Response 3b

Please see DTSC Response 1b.

Comment 3c

Construction and oversight and maintenance of the system should take place to minimize noise impacts to the community.

DTSC Response 3c

Noise from the existing soil vapor treatment system, which is permitted by SCAQMD, is controlled by a blower discharge muffler and other noise reducing equipment. The groundwater extraction wells will be located on-site, adjacent to the freeway. Off-site extraction wells will not be located adjacent or near residences, schools, or other sensitive receptors. After well installations are complete, the two most prominent factors affecting the noise level will be the truck and generator used to perform the aquifer test during normal working hours. With regard to noise generated from construction activities, the Los Angeles Municipal Code (LAMC) restricts noise from such activities during the hours of 9:00 P.M. to 7:00 A.M. All work will be scheduled in compliance with the local noise ordinance for the area. No noise will result from groundwater pumps because they are deep underground.

Comment from South Coast Air Quality Management District (AQMD)

Comment 4

Pursuant to Section 6.6 Major Regulatory Requirements of the RAP, in addition to SCAQMD Rules 401, 402 and 1401, SCAQMD rules and regulations that may apply include:

Rule 201- Permit to Construct

This rule prohibits building, installing, altering or replacing any equipment that may cause or control the issuance of air contaminants without obtain written authorization from the Executive Officer of the AQMD.

Rule 203- Permit to Operate

This rule prohibits the operation or use of any equipment, the use of which may cause or control the issuance of air contaminants, without obtaining a written permit to operate from the Executive Officer of the AQMD.

Rule 1106-Volatile Organic Compound (VOC) Emissions From Decontamination of Soil.

This rule requires an approved plan from the AQMD Executive Officer, notification to AQMD, and monitoring of soil for excavations of underground tanks or transfer piping storing or previously storing VOC materials, or excavation or grading of soil containing VOC materials; and if the soil is measures above 50 ppm with an organic vapor analyzer (OVA) the rule contains various notification, handling, storage and disposal requirements to the excavated soil.

DTSC Response 4

Comment noted. All cleanup technologies will be operated in compliance with SCAQMD rules.

Comments from Los Angeles Department of Water and Power (LADWP)**Comment 5a**

“Currently groundwater does not serve as local drinking water and is not expected to adversely impact local drinking water sources located downgradient from the site”. (Page ES-iii)

This statement is not true as the contamination has already moved off-site and has been detected in LADWP’s downgradient monitoring wells.

DTSC Response 5a

Contamination found in PA-01 and PA-02 (LADWP monitoring wells) has not been conclusively established as originating from the Former Chase Chemical/Holchem site. For instance, ratios of VOCs found in PA-01 and PA-02 differ from ratios near the site. As stated in DTSC Response 1a, additional deep borings will be drilled to determine the downgradient extent of the contamination for compliance with the groundwater monitoring component of the RAP.

Comment 5b

“The RAOs for groundwater are not based on compliance with drinking water standards” (Page ES-iii)

It is important that any treatment achieve the level of drinking water standards so as to allow for the possible installation of future facilities in the area upgradient of the Tujunga Well Field to supplement the City’s groundwater supply.

DTSC Response 5b

Please see DTSC Response 1g.

Comment 5c

“The results indicate that constituents in the soil will not further degrade groundwater over time”. (Page 11)

This is only true if all chemicals are totally removed from the soil; otherwise, as the water table rises or recovers, these chemicals will be further dissolved and contribute to degradation in water quality.

DTSC Response 5c

Please see DTSC Responses 1c, 1f, and 1g regarding protection of beneficial use of the groundwater.

Comment 5d

“With the removal of the source and with natural attenuation, the predicted concentrations at monitoring well LADWP PA-01 stabilize...” (Page 13)

The assumption for natural attenuation is underestimating the problem. The analysis should assume no natural attenuation specifically for the VOCs. It has been LADWP’s experience from reviewing the EPA’s contamination plume maps since 1992 that there has not been significant evidence of natural attenuation.

DTSC Response 5d

The presence of cis,1,2–dichloroethene in the downgradient plume demonstrates that some natural attenuation of PCE has already occurred. As additional information becomes available, the transport modeling will be updated, and calibrated to match observed conditions. In any event, remediation of the groundwater must meet the U.S. EPA’s Natural Attenuation Guidance criteria and other relevant and appropriate guidance and must demonstrate compliance with the Remedial Action Objectives.

Comment 5e

“Following the proposed aquifer test, additional groundwater modeling will be performed using data collected during the test, to determine the need to pump from Paxton Street and establish the approximate groundwater cleanup levels necessary to protect downgradient drinking water sources”(Page 14)

LADWP proposes that any modeling effort should cover a larger area, including the Tujunga Well Field, to show the extent of the contamination plume(s) and the impact that the proposed remedial action will have on the contamination levels.

DTSC Response 5e

Please see DTSC Response 1a.

Comment 5f

“The groundwater extraction wells will be located on-site as determined by the model. Additional pumping wells may be located along Paxton Street, if necessary”. (Page 19)

The proposed pump and treat may take care of the on-site contamination, but will not take care of the off-site contamination, even if additional pumping wells are installed along Paxton Street. Plates Nos. 8, 9, and 10 show that the lateral extent of the plume contamination will travel further downgradient than Paxton Street.

LADWP questions how will this plume be contained and treated.

DTSC Response 5f

Please see DTSC Responses 1a, 1f, and 1g.

Comments from Los Angeles City Councilman

Comment 6a

The recent findings of the June 15, 2005 Offsite Residential Soil Gas Investigation and Data Evaluation report presented by Arcadis are troubling, in that predictive modeling conducted as part of the RAP anticipated human health risk levels an order of magnitude lower than those measured during field testing of shallow soil vapor in residential neighborhoods south from the site. We believe that the soil vapor transport model applied in the RAP to help to develop Remedial Action Objectives (RAOs) should be updated and verified against actual field data, and the RAOs for soil vapor modified as necessary.

DTSC Response 6a

Please see DTSC Response 1d regarding the results of the second round of soil vapor testing. The Remedial Action Objectives established in the RAP are based on human health risk. The RAP has been revised to state that during the Remedial Design the model will be updated using actual field data.

Comment 6b

The results of the recent deep groundwater sampling reported to you by the California Regional Water Quality Control Board (Water Board) on July 11, 2005 (Transmittal of results of Grab Groundwater sampling Phase 2-Saturated Zone Investigation) also reveal environmental impacts that were not predicted by the RAP. We believe that the transport model applied in the RAP to help develop groundwater RAOs should be updated and verified against actual field data, and the RAOs modified as necessary.

DTSC Response 6b

Please see DTSC Response 1a regarding validation of the groundwater model.

Comment 6c

DTSC stated, in their May 4, 2004 public hearing that the currently operating catalytic oxidation system is capable of producing oxidation products equivalent to a continuously operating wood burning fire place. We request that DTSC conduct a careful analysis of vapor treatment options in order to strike the best balance between public health, treatability, community acceptance, and cost. Should catalytic oxidation be selected as the best alternative at the present time, DTSC should provide a timetable for the potential replacement of the system with vapor-phase carbon adsorption system, as the RAP suggests, as soon as contaminant conditions allow. In addition, operating parameters, developed in conjunction with the permitting agency, should be specified in order to ensure that the production of deleterious oxidation byproducts, such as dioxins and furans, are minimized.

DTSC Response 6c

Please DTSC Response 1b.

Comment 6d

The RAP is not clear with regard to the point(s) of compliance with the RAOs for the groundwater plume remediation, potentially creating later challenges when attempting to evaluate the effectiveness of either the Price Pfister or Chase Chemical remedial actions. The physical points of compliance identified by the RAP are the site, and the Tujunga Well Field, which is located about 3.5 miles from the

site. The RAP should also identify compliance points just down gradient from the Chase Chemical site, in the vicinity of Paxton and Louvre Streets, Sutter Avenue, and other soil vapor and monitor well locations. In addition, the RAP should identify the target cleanup levels, or other specific RAOs, established for those points. Finally, the RAOs for offsite groundwater should address the overprint of the Chase Chemical plume on the Price Pfister plume. The RAW should address the RAOs in a manner that makes it clear that the attainment of the Price Pfister cleanup objectives will not be hindered by the presence of the Former Chase Chemical/Holchem Chemicals impacts.

DTSC Response 6d

Please see DTSC Responses 1a and 1g regarding the location of compliance and target cleanup levels, respectively, for groundwater. Regarding overprint of the plumes, please see DTSC Response 2a. Any potential overprint of the plumes would not affect the Remedial Action Objectives.

Comments from Erler & Kalinowski, Inc.

Comment 7a

Existing Underground Chemical Storage Tanks.

What is the closure status of the tanks and when will DTSC require that a site investigation in accordance with California law be conducted?

DTSC Response 7a

Twenty (20) underground storage tanks (USTs), which were a potential source of contamination, were removed in 1998 and replaced with three (3) new USTs under the supervision of the Los Angeles Fire Department (LAFD). The new USTs are permitted by the LAFD, are not being used, and are empty.

Comment 7b

Existing Above Ground Chemical Storage Tanks.

The RAP indicates that there are 18 above ground chemical storage tanks on the Site. Has DTSC confirmed that these tanks are empty.

The data from a soil vapor sample suggest that the PCE in vapor may be from under the nearby tanks. Will DTSC require additional sampling of soil and soil vapor at the tanks?

The RAP (Section 4.3, page 6) indicates that the estimated radius of influence for SVE is 61 to 84 feet. All of the above ground chemical storage tanks are located more than 84 feet from the existing extraction wells. Does DTSC conclude that the SVE system is adequate to remediate this area?

DTSC Response 7b

There are 18 above-ground storage tanks at the site and they are all empty. In the Remedial Investigation conducted for the site, an additional on-site soil and soil gas investigation (see Section 6.3) was recommended in areas around the tanks for the purpose of Remedial Design. This will be implemented at the time of the aquifer test. The results of the investigation will be used to determine if expansion of the soil vapor extraction system is required.

Comment 7c

Extent of VOCs in Soil.

The RAP states that VOCs have been detected in soil vapor in the central and southern portion of the Site and the highest concentrations are found at the former chemical USTs and dispenser area (RAP Section 5.2.1, page 7). However, the lateral and vertical extent of VOCs in soil vapor have not been delineated. When will DTSC require additional vapor monitoring wells at multiple depths and locations so that the vertical and lateral extent of VOCs in soil at the Former Chase Chemical/Holchem Site can be adequately established. Does DTSC conclude that the SVE system is remediating all VOC impacted vadose zone areas?

DTSC Response 7c

Please see DTSC Response 7b. In addition, following shutdown of the soil vapor treatment system, the extent of any remaining VOCs will be evaluated to ensure remedial action objectives are met.

Comment 7d

Extent of Light Free Product on Groundwater.

Will DTSC require delineation of the free product in the downgradient direction?

DTSC Response 7d

Free product has been nearly completely removed by skimming from the source area. No additional delineation of the free product in the downgradient direction is anticipated. The extraction wells proposed at Paxton Street will cleanup any remaining downgradient free product originating from the Former Chase Chemical/Holchem site.

Comment 7e

Extent of VOCs in Groundwater.

Does DTSC plan to require Former Chase Chemical/Holchem to conduct a deep groundwater investigation at the Site?

Does DTSC plan to require Former Chase Chemical/Holchem to remediate the groundwater that is impacting the Price Pfister site?

Does DTSC intend to require Former Chase Chemical/Holchem to conduct any addition investigation of the groundwater?

DTSC Response 7e

Because the VOC contamination is shallowest in the source area on the site, deeper investigation at the site is unnecessary for the purposes of cleanup of the site. Extraction wells proposed along Paxton Street will substantially reduce concentrations of VOCs in groundwater originating from the Former Chase Chemical/Holchem site. The results of testing the new deep borings west of San Fernando Road will be used to determine the method and location of groundwater cleanup that is necessary downgradient of the site, as explained in DTSC Response 1a.

Comment 7f

In addition to 1,4-dioxane and MTBE, groundwater samples collected at the Former Chase Chemical/Holchem site should be analyzed for perchlorate, NDMA, NDEA, and 1,2,3-trichloropropane . Does DTSC intend to require Former Chase Chemical/Holchem to analyze for these chemicals?

DTSC Response 7f

DTSC has already required analysis for 1,4-dioxane and MTBE at the Former Chase Chemical/Holchem site. The analysis list will also include 1,2,3-trichloropropane because it may have been used there. Since NDMA, NDEA, and perchlorate were not used and/or stored at the Former Chase Chemical/Holchem facility, DTSC has not required analysis for these chemicals.

Comment 7g

Risk Assessment

The RAP makes reference to a draft assessment report (RAP Section 1, page 1), not a final document. There is another document called the Final Risk Assessment. Has DTSC approved this Risk Assessment? What clean up goals has DTSC established for the contaminants at the Former Chase Chemical/Holchem site and for groundwater?

DTSC Response 7g

DTSC approved the Final Risk Assessment on April 11, 2005. The clean up goals for the Remedy established in the RAP are based on human health risk for soil vapor and MCLs for groundwater.

Comment 7h

Remedial Action Objective for Soil.

Does DTSC conclude that no further sampling in areas away from UST area is appropriate? Does DTSC agree that Former Chase Chemical/Holchem can stop its SVE system when the concentrations reach asymptotic regardless of their concentration in soil?

DTSC Response 7h

Following operation of the soil vapor treatment system, verification sampling will be conducted to determine residual concentrations in soil. As explained in the RAP (Section 4.3), if concentrations reach asymptotic but are still above the risk-based cleanup goals, a different remedial technology, such as bioventing, may be used.

Comment 7i

Remedial Action Objectives for groundwater.

The RAP states that remedial action objectives for groundwater are not based on compliance with drinking water standards, but are instead based on a less stringent approach to reduce the mass and prevent the migration of chemicals in groundwater to protect drinking water sources located 3.5 miles south of the Site (RAP Section 5.4, page 12). It is our understanding that this goal is not consistent with applicable requirements for protecting human health and the environment, including the RWQCB requirements for protection of groundwater in the Los Angeles Basin.

DTSC Response 7i

The RAP has been revised to clarify the groundwater Remedy and levels for the site which are acceptable to DTSC, presently stated to be MCLs. Please also see DTSC Response 1g.

Comment 7j

Groundwater Modeling:

The RAP states that the objective of the modeling study was to develop a groundwater flow and solute transport model to better understand the extent and fate of chemicals in groundwater and to aid in the selection of a remedy (RAP Section 5.5, page 13). Because site-specific data are not available, Arcadis used literature values to model, it has estimated hydraulic conductivities based on literature values (FS, Appendix D). A better understanding of the actual hydraulic conductivity of the aquifer at the Site and in the vicinity of Paxton Street must be obtained before the number of wells, rate of groundwater flow and actual effectiveness of any extraction system can be predicted. Importantly, the simulated hydraulic gradient in the vicinity of the Site appears to be skewed to the south,

based on historical groundwater data and the observed path of the chemical plume in groundwater from the Former Chase Chemical/Holchem site. This has the misleading implication that the impact to groundwater under the Price- Pfister site is less than it actually is.

The calibration techniques utilized in the modeling of groundwater concentrations over time rely heavily on data obtained at Los Angeles Department of Water and Power (LADWP) well PA-01. There is little information regarding the similarity of the chemical and hydrogeologic conditions at the Site and PA-01. Therefore, predictions in future chemical concentrations based on the model may be significantly under or overestimated.

The RAP indicates that “to be conservative, it is anticipated that the groundwater extraction system would operate until all concentrations of chemicals passing beneath Paxton Street are approximately an order of magnitude lower than currently detected.” Based on this assumption, more than 600 microgram/Liter of cis-1,2-DCE- a value that that is 100 times its MCL-would be allowed to remain under Paxton Street and be a continuing contaminating source of groundwater under the Price Pfister site and other downgradient sites. Does DTSC think this is appropriate?

The model may provide useful results after (1) clarification of the remedial action objective for groundwater to be more protective of groundwater, (2) delineation of the vertical and lateral extent of VOCs in groundwater, and (3) an aquifer test, which is proposed in the RAP.

DTSC Response 7j

Please see DTSC Responses 1a, 1f, and 1g. Also, please note that DTSC disagrees with many of the interpretations of data in the EKI Report, “Results of Grab Groundwater Sampling, Phase 2-Saturated Zone Investigation”. Please see the response letter prepared by ARCADIS, dated November 15, 2005, assessing the EKI results, available in the repository.

Comment 7k

Groundwater Pump and Treat:

The discussion suggests that pump and treat may not be implemented until after the free product (i.e., LNAPL) has been removed (RAP Section 6.3.3.1., page 18). It is our understanding that the free product removal is a very slow process and can take several years. If this is the case, what is the likely impact to downgradient groundwater if the on-site pump and treat system is not implemented until after free product removal?

Extraction wells may be needed on-site, at Paxton Street, and further downgradient of the Former Chase Chemical/Holchem site?

DTSC Response 7k

The LNAPL removal is virtually completed (see DTSC Response 7d), and this source removal will reduce the downgradient concentrations of contaminants. The effect of the removal on groundwater cannot be evaluated until the aquifer test and Remedial Design is completed. During the Remedial Design, the need for installation of additional groundwater extraction wells will be evaluated.

Comments from California Environmental Rights

The following comments were recorded at the Public Meeting before the City of Pacoima, on 05/04/05.

Comment 8a

My chief concern is that I don't believe that this site has been adequately characterized for moving forward with decisions on Remedial Action; and under CEQA at this point, CEQA is the California Environmental Quality Act. And in order to move forward you have to have adequate characterization of the site on the project.

DTSC Response 8a

Characterization (investigation) of the Former Chase Chemical/Holchem site is sufficient to move forward with remediation. The basic components of the Remedy established in the RAP for groundwater cleanup on-site and at Paxton Street will not change based on additional data to be collected during the Remedial Design phase. In compliance with CEQA, an Initial Study was prepared to determine the environmental impacts of the remediation of the site. For the purposes of CEQA, the "project" for the Initial Study is the implementation of the Remedy, which is adequately defined in the RAP. Based on the Initial Study, the Remedy for the site will not have a cumulative negative effect on the public or environment, as stated in the Negative Declaration.

Comment 8b

You have taken samples only to a depth of about 170 feet, a ground sample, and it looks like the deepest well is actually screened at about 120 feet and the aquifer, I think the bottom of that aquifer is much, much deeper at the drinking water wells- they are screened at I think about 480 to 550 feet if not deeper. And so what we're dealing with here is a chemical or chemicals that some of which are heavier than water and sink in water. And if you haven't taken samples beneath 170 feet, I don't see how you can say that you have characterized a site properly

DTSC Response 8b

Please see DTSC Response 1a.

Comment 8c

You admit that you haven't fully reviewed or decided what's going on with the vapor intrusion potential and soil/vapor and have on-going analyses and reports to be read and looked at with that regard. Your decision on how to clean up the site is premature at this point.

DTSC Response 8c

Please see DTSC Response 1d.

Comment 8d

On several occasions you said that there's no evidence of deeper contamination than below the 120 feet. However, in the RAP there's an acknowledgement that the downstream DWP well P-A01, I think is, 2500 feet downstream, is contaminated with PCE, TCE and 1,1-DCE. These are all chemicals that are affiliated with findings at the Former Chase Chemical/Holchem Site and may or may not be attributable to the Former Chase Chemical/Holchem Site. But since it's downstream and directly downstream, and the characterization of it in your documents seems to indicate that it actually is from the Former Chase Chemical/Holchem site. There is, in fact, evidence because the screening level of those wells is at 250 feet, around 250 feet. So that is some evidence of those contaminants moving downstream and moving deep past the fault.

DTSC Response 8d

Please see DTSC Response 1a.

Comment 8e

The earthquake fault, which may or may not be some kind of a barrier to the movement of the groundwater, but it is an issue of concern that needs to be resolved prior to making these cleanup decisions.

DTSC Response 8e

The Remedy established in the RAP for groundwater cleanup on-site and at Paxton Street is not dependent on the location of the earthquake fault, which is located downgradient from the site. As stated in DTSC Response 1a, additional borings will be drilled to determine the downgradient extent of the groundwater contamination for compliance with the groundwater monitoring component of the RAP. These additional borings will be drilled in the vicinity of the earthquake fault, which will provide information regarding its effect on groundwater movement.

Comment 8f

What I am concerned about is that when I look at your characterization of the groundwater plumes, if you're cleaning up to the groundwater standard for the contaminants, which are at least here, the TCE and the PCE that you have not characterized it to the extent that you need to in terms of adequately defining the outer edge of the plume stepping out far enough, taking groundwater and putting it in wells-taking groundwater samples out far enough to establish where the actual edge of the plume is so you know how far out you need to go to clean up to groundwater standards.

DTSC Response 8f

Please see DTSC Responses 1a and 1f.

Comment 8g

Your Soil vapor Treatment System you have in place since January of 2003 a catalytic oxidizer that is treating chlorinated solvents. There is a possibility that that system maybe emitting dioxins, and I see no consideration of those potential emissions in any of your Remediation and Risk Assessment documents.

And I think without having fully identified what you're going to do with the groundwater, whether or not you're going to use an oxidizer on it whether or not there could be potential additional dioxins and current issues involved, whether the soil/gas investigations are going to lead to some other conclusions in regard to potential vapor intrusion in the houses, that this project hasn't reached the stage where you are ready for a CEQA decision.

DTSC Response 8g

Please see DTSC Responses 1b, 1d, and 8a.

Comment 8h

The responsible party, Former Chase Chemical/Holchem, is responsible for getting that NPDES permit for the discharge-but if not "we"okay. I mean that's really important to remember the role of the agency versus the role of the responsible party.

DTSC Response 8h

The responsible party will be required to obtain and comply with a National Pollutant Discharge Elimination System (NPDES) permit. The Los Angeles Regional Water Quality Control Board is the agency which issues the NPDES permit.

Comment from Community Member

Comment 9

What is the land going to be used for now? You didn't say that. How will this effect the Pacoima people living here now? Our kids are going to get sick from this? Are you saying that the public will not have any part of this????

DTSC Response 9

The deed restriction will prevent the Former Chase Chemical/Holchem site from being used for residential purposes or other sensitive uses, thereby limiting the amount of exposure for all future users of the site. The results of the soil vapor testing in the residential area downgradient of the site indicate the levels of contaminants in soil vapor originating from the Former Chase Chemical/Holchem site are within acceptable risk levels used by DTSC (1×10^{-6} risk, or one person in a million).

The proposed cleanup activities are protective of human health and the environment, ensured through regular testing and maintenance. In conjunction with the deed restriction, a soil management plan will be developed and enforced to maintain protection of human health during and after any redevelopment activities.

Comment from Community Member

Comment 10

On regards to the proposed plan of action, you are the experts in that matter. I want to know if we have been exposed to these chemicals by living in the area? Is this cleanup just starting? Why does it take so long?

DTSC Response 10

Please see DTSC Response 9. The cleanup of the soil contamination on-site has been underway since January, 2003. The additional cleanup established in the RAP has been developed in accordance with a Consent Decree issued by the U.S. District Court in 2000. Implementation of the RAP is dependent on Court approval of a new or amended Consent Decree.

Comment from Community Member

Comment 11

Cost wise what should we expect in tax increase for cleaning up Former Chase Chemical/Holchem facility hazardous waste, and what should we expect as a community housing this waste facility in our neighborhood?

DTSC Response 11

There will be no tax increase caused by the cleanup of the Former Chase Chemical/Holchem site. The Responsible Party is responsible for the cost of the cleanup. Also, please see DTSC Response 9.

Comments from Community Member

Comment 12a

What type of studies were performed to prove these sort of cleaning practices do not impact the water source. Despite the fact that this ground is not used for consumption, has the water been tested for any type of fungus or tested so in no way may it seep up through “caps”?

DTSC Response 12a

Remedial alternatives presented in the RAP were evaluated using the U.S. EPA’s Nine National Contingency Plan (NCP) criteria, which includes protection of human health and the environment. The treated groundwater is currently planned to be disposed into the storm drain under an NPDES permit to be issued by the LARWQCB. This will eliminate any exposure to the groundwater after it is cleaned. Drinking water wells are tested by the Department of Water and Power.

Comment 12b

Although the document lists chemicals and solvents, it does not describe the effect of said solvents on the immediate environment. The restriction of limiting the facilities to only daycare is not enough. If the ground water is polluted, wouldn’t living or any type of business run risk from contaminants. Pumping the contaminated materials means contaminated water will be drained through sewer systems polluting the environment. The only purpose your flier satisfies is to inform of hearing. Any details attempted have been lost in the lack of examples and clear explaining.

DTSC Response 12b

Please see DTSC Responses 1d and 12a. All documents have been made available at the public repositories.

Comment from Community Member

Comment 13

Are mailers like this planned for Price Pfister?

DTSC Response 13

It is DTSC's understanding that LARWQCB will conduct community outreach efforts for the Price Pfister site.

Comment from Community Member

Comment 14

I would like to see the contaminated water taken out also.

DTSC Response 14

Please see DTSC Response 12a.

Comment from Community Member

Comment 15

It is my understanding that the Deed that will be issued is zoned for industrial and commercial use. What is the definition of "commercial use? I'm concerned about restaurants et al...Starbucks, utilizing this site. Also what is the plan of action for monitoring the site once businesses are in place? How long monitored?

DTSC Response 15

Zoning is controlled by the City, however, the City will review the deed restriction to determine the appropriate use of the property. Acceptable risk levels for both commercial and industrial uses are the same (1×10^{-5} risk, or one person in one hundred thousand).

Comment from Community Member

Comment 16

Where do the byproducts of these remediations go for disposal? What is the impact on the homes across the street?

DTSC Response 16

Please see DTSC Response 1d regarding soil vapor testing in the residential area, DTSC Responses 1b and 2b regarding emissions from the soil vapor extraction system, and DTSC Response 12a regarding disposal of treated groundwater.

Comment from Community Member

Comment 17

How is DTSC working with the Water Board in cleaning up both Former Chase Chemical/Holchem and Price-Pfister site?

DTSC Response 17

Please see DTSC Response 1h.

Comment from Community Member

Comment 18

We would like at least 90 days extension for public comment period, because 30 days is not enough for community.

Home vapor intrusion is an issue because VOCs were found in residential areas.

What is the protocol for home vapor intrusion investigation?

TCE/PCE are heavier than water, meaning these chemicals will be found at the bottom of the aquifer. The wells being drilled need to be deep enough to reach the bottom of the aquifer, meaning more 170 feet (700-900 feet)?

DTSC Response 18

DTSC has granted the extension request for public review of the RAP. The protocol for home vapor intrusion investigation follows current DTSC guidance. However, based on the results of soil vapor investigation conducted in the residential neighborhood downgradient of the Former Chase Chemical/Holchem site, indoor air testing is not necessary. Please also see DTSC Responses 1a and 1d.

Comment from Community Member

Comment 19

What are the results regarding the soil gas surveys that were conducted on March 2005 on Weidner, Daventry, Louvre, San Fernando and Sutter Ave.?

The RAP says that groundwater will not be cleaned up to drinking water standards because the groundwater is not a drinking water source, but it is a potential future drinking water source. Why is the clean-up is not being held to drinking water standards?

DTSC Response 19

Please see DTSC Response 1d regarding the soil gas surveys. The clean up goals for the Remedy established in the RAP are based on human health risk for soil vapor and for groundwater, to levels acceptable to DTSC, at this time MCLs.

Comment from Los Angeles Valley College, Department of Earth Sciences

Comment 20

Why does RAP allow for water quality cleanup goals to be less than drinking water standards when correspondence from DTSC says the goal is drinking water standards?

Isn't the 'negative declaration' premature? Is site characterization complete?

How can this declaration include all phases of cleanup?

We need 90 day public comment period. We only have two weeks with 30 day period.

Why aren't wells deeper to find denser compounds, samples for 170' deep wells are only 170'- are the wells as deep as the aquifer?

There are questions marks on the iso pleths of the plume for TCE. If the boundaries are not known how can the cleanup goal be met?

Why does deed restriction ignore residential areas adjacent?

DTSC Response 20

Please see DTSC Responses 1a, 1d, 7g, and 8a. The public comment period was extended as requested.

Comment from Community Member

Comment 21

What is the difference between DTSC and the Water Board in relation to the open process? How is the community informed about the difference and how could the community keep each agency accountable if there is a discrepancy between what is said and what is tested?

We are asking for a 90 day extension instead of 5-20-05 Deadline of Public Comment Period.

DTSC Response 21

DTSC and the LARWQCB both provide data and reports to the public at meetings and in public repositories. Both agencies have their own processes by which the public can review and comment on the environmental investigation and cleanup of these sites.

Comment from Community Member

Comment 22

I have been living here in Pacoima since 1988. I have breathing problem. I have asthma.

DTSC Response 22

This question should be directed to your medical doctor. Also please see DTSC Response 1d.

Comment from Community Member

Comment 23

**If Former Chase Chemical/Holchem is only cleaning the groundwater to an industrial use and so is Price-Pfister, is the cumulative impact of the sensitive receptors taken into consideration? How?
Are there different standards to clean up the contamination for on and off site?
What are they?**

DTSC Response 23

Please see DTSC Response 2e regarding cleanup standards for on and off-site. Regarding cumulative impacts, the findings of the CEQA Initial Study determined that there were no significant cumulative impacts on the public and the environment from the implementation of the Remedy for the Former Chase Chemical/Holchem site.

Comment from Reseda Neighborhood Council

Comment 24

**How many more facilities in the SFV have this problem? Or, is this an isolated situation?
Is this water contained in this area as not to be passed onto other water channels?**

DTSC Response 24

There are many recorded facilities and potentially undiscovered sites with contaminated soil and groundwater beneath in the San Fernando Valley. The water under the Former Chase Chemical/Holchem site is not contained, which is why the site is under remediation.

Comment from Community Member

Comment 25

Is the concentration left in the groundwater considered in isolation of other toxic sites in our community or is the cumulative impact being considered?

DTSC Response 25

In general, sites are considered in isolation during investigation and remediation, and exposures to air contaminants from smoking, nearby charbroilers, freeways, etc. are not considered. However, the CEQA process considers cumulative impacts of the Remedy. The findings of the CEQA Initial Study determined that there were no significant cumulative impacts on the public and the environment from the implementation of the Remedy for the Former Chase Chemical/Holchem site._

Comment from Community Member

Comment 26

**We understand that there are 2 wells, 40 and 41 that are not being drilled because they are right over the Former Chase Chemical/Holchem plume. Is Former Chase Chemical/Holchem going to drill them to the bottom of the aquifer?
Explain: Why they aren't being drilled? I request 90 day time frame.**

DTSC Response 26

Please see DTSC Response 1a. The public comment period was extended as requested.

Comment from Community Member

Comment 27

**In regards to clean-up standards, if on-site is left at "industrial commercial use standards", what happens if the on-site plume flows off site in the future?
When is clean-up considered "clean?"**

DTSC Response 27

Please see DTSC Responses 1g and 2e. The clean up goals for the Remedy established in the RAP are based on human health risk for soil vapor and for groundwater, to levels acceptable to DTSC, at this time MCLs.

Comment from Community Member

Comment 28

During clean-up will there be no exposure to chemicals as they are cleaned up out of the soil and groundwater. Right now Price Pfister is digging deeper and deeper and piling the refuse so that it is exposed to everyone.

DTSC Response 28

There is no soil removal planned for the Former Chase Chemical/Holchem site. The findings of the CEQA Initial Study determined that there were no significant cumulative impacts on the public and the environment from the implementation of the Remedy (treatment of soil and groundwater) for the Former Chase Chemical/Holchem site. Please direct questions regarding Price Pfister to the LARWQCB.

Comment from Community Member

Comment 29

I'm concerned how you are going to construct the underground pipes to run the contaminated groundwater from the site safely. Under Paxton Street and where else? Where's the disposal point empty out? Will be the piping be of a heavy-duty piping in case of either a cut earthquake or so the contaminants won't leak.

DTSC Response 29

The proposed plan is to run the clean groundwater to the storm drain under an NPDES permit (see DTSC Responses 8h and 12a). All piping and other materials will be designed and constructed in accordance with American Society for Testing and Materials (ASTM) standards. During the Remedial Design phase (following the RAP), the exact design and specifications for the system will be determined.

Comment from Community Member

Comment 30

**Does the the groundwater treatment design guarantee that the plume from Former Chase Chemical/Holchem will not reach the Rinaldi-Toluca & Tujunga well fields. Will monitoring wells be installed around well fields?
What type of treatment will be used to treat the groundwater.
How long will treatment take?**

DTSC Response 30

Please see DTSC Responses 1a, 1b, 1c, and 1f. During the Remedial Design, additional groundwater monitoring locations will be established to ensure protection of the drinking water well fields. As is common for groundwater contamination, the Remedy for the groundwater may take years to complete.

Comment from Community Member

Comment 31

Soy una madre de familia , I estoy agradecida con el equipo que trabaja en el proyecto para bien de la comunidad de Pacoima. Para este caso yo vivi a 2 blokes de este sitio I me preocupa el futuro de mis nietos I osala no tengan ulguna consecuencia, les deceo mucho exito.

Translation: I am the mother of a family, I am really thankful with the team that works on this project that is for the good of community of Pacoima. I lived two blocks east of the site and I am concerned about my grandchildren's future. I hope that they do not have any consequence. I wish you a lot of success.

DTSC Response 31

Por favor ver DTSC Respuesta 1d:

La propiedad es exclusivamente para el uso comercial/industrial, y un documento legal será puesto en efecto para asegurar este uso en el futuro. Los resultados del examen del vapor terrenal en el área residencial, indica que los niveles contaminantes en el vapor terrenal originados de el sitio Former Chase Chemical/Holchem están entre los niveles aceptables de riesgo para el uso residencial de acuerdo a las reglas de DTSC (1 X 10⁻⁶ riesgos, o una persona en cada millón). Cualquier contaminación potencial que se haya originado del sitio Former Chase Chemical/Holchem e impactado sitios cercanos residenciales, serán limpiados hasta cumplir con los estandartes residenciales.

Translation: Please see DTSC Response 1d: (Translation of DTSC Response 1d is provided.)

Comment from Community Member

Comment 32

**Cuales son los impactos del cloruro de vinilo?
Se ha encontrado cloruro de vinilo en el sitio de Price Pfister?**

Translation: What are the effects of the Vinyl Chloride? Has Vinyl Chloride been found at the Price-Pfister Site?

DTSC Response 32

Esta sustancia ha sido incluida en la lista de carcinogenos de la Agencia de Proteccion del Medio Ambiente de Los Estados Unidos. Documentos acerca de los contaminantes en el sitio Price-Pfister estan disponibles en la libreria publica de Pacoima.

Translation: This substance has been listed as a carcinogen (cancer-causing) by the United States Environmental Protection Agency. Documents about contaminants at the Price-Pfister site are available at the Pacoima Public Library.

Comment from Community Member

Comment 33

Mi pregunta es si estos quimiros no pueden ser quimicamante netralizados en el mismo lugar donde estan.

Translation: My question is, is if it not possible to have the chemicals neutralized at the same location where they are.

DTSC Response 33

Para dar tratamiento y/o neutralizer los quimicos en el propio lugar en que estan ubicados no es posible, ya que esos quimicos se mueven con y en el agua subterraneos.

Translation: It is not possible to treat/neutralize chemicals at the location where they are, because these chemicals are migrating with the groundwater flow.

Comment from Community Member

Comment 34

Senor Gabriel, deseo unirme ala hucho para la limpieza de nuestra area y sobre todo de el sursuelo da la Compania Former Chase Chemical/Holchem pues nosotras fenemos ninos y hemos notado que desde que nos emos movido a esta area mis ninos y nosotros nos empermamos mas y estoy. Dispuesto a reunirme con husted las veses que sia necesaria evente con nuestra apollo

Translation: Mr. Gabriel, I wish to join in the fight to clean-up our area and most of all the clean-up of the underground soil of the Former Chase Chemical/Holchem Company. We have noticed that since we moved to this area we, including our children, are getting sick more often. I am willing to meet with you any time that is necessary. Count on our support.

DTSC Response 34

Gracias por su apoyo. El propuesto sistema de tratamiento esta disenado para proteger la salud y el medio ambiente durante su operacion y para remover la fuente de la contaminacion. Se llevaran a cabo mantinimiento (del sistema) para asegurar el buen funciamento y asegurar la proteccion continua a lo largo de la vida operacional del sistema de extraccion y tratamiento del agua subterranean. Un plan para administrar el suelo sera desarrollado para dar cumplimiento y mantener proteccion a la salud y el medio ambiente durante y despues de las actividades de redesarrollo. Por favor ver DTSC Respuesta 1d:

La propiedad es exclusivamente para el uso comercial/industrial, y un documento legal será puesto en efecto para asegurar este uso en el futuro. Los resultados del examen del vapor terrenal en el área residencial, indica que los niveles contaminantes en el vapor terrenal originados de el sitio Former Chase Chemical/Holchem están entre los niveles aceptables de riesgo para el uso residencial de acuerdo a las reglas de DTSC (1×10^{-6} riesgos, o una persona en cada millón). Cualquier contaminación potencial que se haya originado del sitio Former Chase Chemical/Holchem e impactado sitios cercanos residenciales, serán limpiados hasta cumplir con los estandartes residenciales.

Translation: Thank you for your support. The proposed treatment system is designed to protect human health and the environment during operation and once the source of contamination is removed. Regular maintenance is performed to ensure continued protection throughout the operational life of the groundwater extraction/treatment system. A soil management plan will be developed and enforced to maintain protection of human health during and after any redevelopment activities. Please also see DTSC Response 1d: (Translation of DTSC Response 1d is provided).

Comment from Community Member

Comment 35

No me queda claro el tratamiento biologico, que se menciona en el borrador, a mi parecer todo la que es tratado biologicamente tiene menos impacto ambiental.

Que sucede con los vapors extraidos? Cuando los extraen hacia donde los diseminan o son tratados antes de diseminarlos... a la atmosfera?

A mi como residente de esta area y madre de familia me preocupa que en esta zona hay no solo esto sino los basureros etc. pero a la vez me tranquiliza que uds. Esten hacienda esto y nos dan (unintilligible) y participar (unintilligible0 agradecimiento y espero estar en la reunion.

Gracias (DTSC) por mantenernos informados.

Translation: I am still not clear about the biological treatment that is mentioned in the draft document, it looks to me that anything that used biological treatment has less impact in the environment. What happened to the extracted vapors? When the (vapors) are extracted where are they spread? Or are they treated before they are spread in the atmosphere. I am concerned as a resident and as a mother, that in this area exists not only this but also landfills etc., but at the same time I feel with “confidence” that you are doing this and will let us know and participate. Thank you (DTSC) for keeping us informed.

DTSC Response 35

El propuesto sistema de tratamiento es el mayor sistema de tratamiento de agua subterránea existente para la contaminación que se encontró en el sitio de Former Chase Chemical/Holchem. El sistema va a transformar los vapores extraídos a sal de cocinar, agua, y dióxido de carbono. Si las concentraciones en el agua subterránea son reducidas tanto como sea posible con este tratamiento, pero aún sobre pasan las metas de limpieza de la base del riesgo, entonces otro método de recuperación como la bioventilación puede ser usado, como se explica en el documento llamado ‘RAP’. La bioventilación es un proceso donde el oxígeno es introducido en el agua subterránea y hace que los contaminantes se quiebren. Por favor ver DTSC Respuesta 1b:

La típica temperatura operante para el convertidor catalítico de componentes del sistema de vapor terrenal actual es de 750-850 grados Fahrenheit (F). Esta es más baja que la temperatura promedio (1400-2200 grados F) donde los compuestos que han llegado a ser dióxidos se han producido. La temperatura baja de 850 grados F a 140 grados F casi inmediatamente (1-2 segundos) cuando cae en el sistema frotador. El frotador remueve prácticamente todo el cloro, el cual previene que se combine con los restos clorados no quemados de cualquier compuesto orgánico volátil (por sus siglas en inglés VOCs) y los dióxidos que se formen. Finalmente, el gas se mueve hacia un tanque neutralizante, donde los productos de desintegración finales son dióxido de carbono, cloruro de sodio (sal), y agua. Además, el sistema no produce ceniza o metales pesados porque al aire es filtrado para remover sólidos antes de la combustión.

En este sitio, DTSC encontró que el sistema actual es la alternativa preferida dado que las concentraciones de VOCs son muy altas para tecnologías alternativas como la activación del carbón granulado (por sus siglas conocidas en inglés GAC). El reporte en inglés llamado RAP, describe el sistema de tratamiento de vapor terrenal que ya está operando en el sitio. Como está delineado en el RAP, el sistema continuará operando y también será usado durante el periodo de limpieza del agua subterránea para destruir los VOCs que serán extraídos de ésta.

Translation: The proposed treatment system is the best available groundwater treatment system for the contaminants found at the Former Chase Chemical/Holchem site. The system will break down the extracted vapors directly to table salt, water, and carbon dioxide. If concentrations in the groundwater are decreased as much as possible with this treatment but are still above the risk-based cleanup goals, a different remedial

technology, such as bioventing, may be used, as explained in the RAP. Bioventing is a process where oxygen is introduced into the groundwater to help break down the contaminants. Please also see DTSC Response 1b: (Translation of DTSC Response 1b is provided).

Comment from Community Member

Comment 36

Want to know about Price-Pfister site.

DTSC Response 36

Documents describing the Price-Pfister site are available at the public repositories.

Comment from Community Member

Comment 37

Please send me more information regarding this project.

DTSC Response 37

Documents describing the Former Chase Chemical/Holchem cleanup project are available at the public repositories.

Comment from Community Member

Comment 38

Cual es el resultado hasta este punto?Y Que hay acerca de la seguridad y la salud?

Translation: What is the result up to this point? And what about health and safety?

DTSC Response 38

DTSC ha revisado y evaluado los datos del vapor del suelo y ha incorporado esta informacion en el Documento final llamado "RAP". El resultado de la prueba del vapor del suelo indica que los niveles de los contaminantes en el vapor del suelo estan dentro de los niveles de riesgo aceptable para el area residencial y de acuerdo con las normas del DTSC. El sistema propuesto para el tratamiento del agua subterranea esta disenado para proteger la salud y el medio ambiente. Un plan para controlar el uso de la tierra sera desarrollado para mantener la proteccion de la salud durante y despues de las actividades de redesarrollo.

Translation: DTSC has reviewed and evaluated the soil vapor data and has incorporated the findings in the Final RAP. The results of soil vapor testing indicate the levels of contaminants in soil vapor are within acceptable risk levels for residential use consistent with DTSC guidelines. The proposed groundwater treatment system is designed to protect human health and the environment. A soil management plan will be developed and enforced to maintain protection of human health during and after any redevelopment activities.

Comment 39

Por favor dejar corresponderencia para cualquier persona que sea dirigida a la siguientes direcciones. Tenemos inquilinos nuevos en estas dos direcciones.

Translation: Please include me in the mailing list (gives address). We are new tenants at the two addresses. Thank you.

DTSC Response 39

Su nombre será añadido a la lista de correo.

Translation: You will be added to the mailing list.

Comment from the LARWQCB

Comment 40

The data from deep boreholes completed by RWQCB indicate that the downgradient extent of the cis-1,2 DCE plume has not been fully defined as the cis-1,2 DCE concentrations at PB-50, at the water table , still exceed the MCL at this location.

DTSC Response 40

Please see DTSC Response 1a.